

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MEGAN JURIC and JUSTINE STUHL, on behalf of themselves and all others similarly situated,	:	
	:	Civil Action No. 2:20-cv-00651-MJH
	:	
Plaintiffs,	:	
	:	Electronically Filed
v.	:	
	:	
DICK’S SPORTING GOODS, INC.,	:	
	:	
Defendant.	:	

**DECLARATION OF DEBORAH VICTORELLI IN SUPPORT OF DEFENDANT’S
MOTION TO COMPEL ARBITRATION, STRIKE CONSENT TO JOIN FORM, AND
DISMISS CLAIMS OF PURPORTED OPT-IN PLAINTIFF ANTHONY ALBACETE**

I, Deborah Victorelli, declare as follows:

1. I am making this Declaration in support of Defendant Dick’s Sporting Goods, Inc. (“Dick’s”) Motion to Compel Arbitration, Strike Consent to Join Forms, and Dismiss the Claims filed in the above-captioned matter by Anthony Albacete (referred to herein as the “Purported Opt-in Plaintiff” or “Albacete”). (ECF No. 15.) I am over the age of 18 and am competent to testify. If called as a witness, I would and could competently testify to the facts set forth in this Declaration based on my personal knowledge.

2. Dick’s is a leading sporting goods retailer with stores throughout the United States. I am employed by Dick’s as its Vice President of Human Resources.

3. The information contained in my declaration given in this matter dated May 11, 2020 is incorporated by reference herein.

4. In relation to this lawsuit, I performed a query to determine the hire date and position of the Purported Opt-in Plaintiff Anthony Albacete. Based on the results of my query, I attest that Dick’s employed Albacete in Trader’s Point, Indiana from on or about August 13,

to October 20, 2018.

5. Albacete was employed with Dick's when it rolled out the Agreement to Arbitrate Claims in or around June 2016 (see Exhibit A to my May 11, 2020 declaration, referred to herein as the "2016 Agreement").

6. Based on an inquiry I made to Dick's HRMS system described in Paragraph 3 of my May 11, 2020 declaration, Albacete agreed to and acknowledged the 2016 Agreement at approximately 9:09 a.m. on August 1, 2016. A true and correct copy of the output of this query is attached to this declaration as **Exhibit A**.

7. On January 16, 2020, I ran a query for all associates who have opted out of Dick's Agreement to Arbitrate Claims since Dick's Arbitration Program was instituted. While Plaintiffs Megan Juric and Justine Stuhl appear in PeopleSoft's response to this query (and thus are confirmed to have opted out of the Arbitration Agreement), Albacete does not appear in PeopleSoft's response to this query. Moreover, Albacete's employee profile in PeopleSoft indicates he acknowledged and agreed to the Agreement to Arbitrate Claims, pursuant to the process discussed in my May 11, 2020 Declaration, but did not send Dick's any email, letter or other communication requesting to opt out of Dick's Arbitration Program.

I declare under penalty of perjury of the laws of the Commonwealth of Pennsylvania and of the United States that the foregoing is true and correct.

Executed this 15th day of May, 2020, at Coraopolis, Pennsylvania.



Deborah Victorelli

4847-6197-0364.1 106625.1001

EXHIBIT A

Department	Location	ID	Name	Job Title	Arbit Signoff	Last Start	Pay Status	Term Date	Arb Signoff Date	Time	ARB Opt Out?	OptOut_Rec'd
Management	Store0475 Trader's Point IN	0333393	Albacete,Anthony Brian	ASM Operations	Y	8/13/2014	T	10/20/2018		8/1/2016 9:09		